

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

DANIEL SIMAAN, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

T-MOBILE USA, INC.,

Defendant.

No. 2:21-cv-01181-BJR

**UNOPPOSED MOTION AND  
PROPOSED ORDER TO EXTEND  
TIME TO ANSWER COMPLAINT**

Under Western District of Washington Local Rule 7(d)(1) and 10(g), Defendant T-Mobile USA, Inc., moves the Court to extend T-Mobile's deadline to answer or otherwise respond to the Complaint in the above-captioned action for a total of 30 days to October 25, 2021. Plaintiff Daniel Simaan does not oppose T-Mobile's requested extension.

Good cause exists for this extension because there is a pending motion before the Judicial Panel on Multidistrict Litigation ("JPML") regarding transfer and coordination or consolidation of related cases for pretrial proceedings under 28 U.S.C. § 1407, filed on August 23, 2021. *See In re T-Mobile, Inc., Customer Data Security Breach Litigation.*, MDL Docket No. 3019 (ECF No. 1). The plaintiffs in a related case filed the transfer motion, and T-Mobile fully anticipates that—in addition to this case—dozens more will be noticed to the JPML based on its similar nature. *See id.* (ECF Nos. 1, 8-1, 11, 20). The additional 30 days will conserve judicial resources by allowing

T-Mobile to assess the pending JPML motion and continue discussions with Plaintiff's counsel

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1 here and counsel in the related cases before responding to Plaintiff's Complaint.

2 Dated: September 14, 2021

3 By: /s/ Steve Y. Koh

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13 *Attorneys for Defendant T-Mobile USA, Inc.*

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**ORDER**

IT IS SO ORDERED.

Dated this 16th day of September 2021.

s/Barbara J. Rothstein

Barbara J. Rothstein  
U.S. District Court Judge

Presented by:

s/ Steve Y. Koh

Steve Y. Koh, WSBA No. 23284  
Kathleen M. O'Sullivan, WSBA No. 27850  
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